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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

PROGRESSIVE SEMICONDUCTOR
SOLUTIONS LLC,

Plaintiff,

vs.

QUALCOMM TECHNOLOGIES,
INC.

Defendant.

PROGRESSIVE SEMICONDUCTOR
SOLUTIONS LLC,

Plaintiff,

v.

MARVELL SEMICONDUCTOR,
INC.,

Defendant.

CASE NO. 8:13-cv-01535 ODW (JEMx)
CASE NO. 8:14-cv-00330 ODW (JEMx)

FINAL JOINT CLAIM CHART

Pursuant to the Patent Standing Order, Plaintiff Progressive Semiconductor Solutions LLC (“Plaintiff”) and Defendants Qualcomm Technologies, Inc. (“Qualcomm”) and Marvell Semiconductor, Inc. (“Marvell”) hereby provide the following Joint Claim Chart in connection with the claim construction proceedings for U.S. Patent Nos. 6,473,349 (“’349 Patent”) and 6,862,208 (“’208 Patent”). Plaintiff asserts the ’349 Patent against Qualcomm and against Marvell. Plaintiff also asserts the ’208 Patent against Qualcomm only. The parties have proposed constructions for each disputed claim term, phrase, clause, and have identified supporting evidence for their proposed construction, as summarized in the following two charts:

’349 Patent:

Claim Term	Plaintiff’s Proposed Construction	Defendant’s Proposed Construction
<p>“the amplifier being controlled by the sense enable signal and being made operative only when the pair of pass transistors are made nonconductive by the sense enable signal”</p> <p>(claims 1, 8, 13)</p>	<p>No construction necessary; plain and ordinary meaning applies, except as to the terms “operative” and “sense enable signal,” which are defined as follows:</p> <p>“operative” should be construed to mean “functional to produce an intended effect”</p> <p>“sense enable signal” should be construed to mean “a signal that enables the sense amplifier to function as intended”</p> <p><u>Intrinsic evidence:</u> Col. 1, ll. 34-40 Col. 1, ll. 54-57</p>	<p>"the sense enable signal simultaneously activates the amplifier and turns off the pair of pass transistors"</p> <p><u>Intrinsic Evidence:</u> Claim Semantics. Abstract; Figs. 2 – 6; 1:14- 16; 1:60-64; 2:45-48; 3:2- 12; 3:26-30; 3:34-51; 3:51-56; 4:4-8; 4:48-51; 4:51-54; 4:54-58; 4:59- 5:8; 5:27-31; 6:28-30; 7:45-47; and 7:11-13. 2002-06-27 Response to Non-Final Office Action at 9-10.</p>

1		Col. 2, ll. 45-48 Col. 3, ll. 10-12 Col. 3, ll. 28-32 Col. 3, ll. 34-56 Col. 4, l. 63 through Col. 5, l. 1 Figures 2, 3, 4, 5, and 6.	U.S. Pat. No. 5,650,971 ("Longway <i>et al.</i> ") at Figures 4a and 6a.
2		<u>Extrinsic evidence:</u> "operative" -adj 1. in force, effect, or operation 2. exerting force or influence 3. producing a desired effect; significant: <i>the</i> <i>operative word</i> . Dictionary.reference.com	<u>Extrinsic Evidence:</u> The American Heritage Dictionary of the English Language, 4th Ed., 2001 at 594 ("operative"). Newton's Telecom Dictionary, 16.5 Ed., 2000 at 217, 320 ("conductor," "enable"). Wiley Electrical Engineering and Electronics Dictionary 2004, at 139, 510, 256, 22- 23 ("conductive," "non- conductive," "enable," "amplifier"). McGraw-Hill Dictionary of Scientific and Technical Terms, 6th Ed. at 459-460, 716, 1898, 89-90 ("conductive," "enable," "sense," "amplifier").
3		Expert testimony of Dr. Hayes	
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19	"in response to a sense enable signal / in response to the sense enable signal"	No construction of "in response to" necessary; plain and ordinary meaning applies. ("sense enable signal" is discussed above)	"directly controlled by a [the] sense enable signal"
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21			
22	(claims 1, 8, 13)	<u>Intrinsic evidence:</u> Col. 5, ll. 27-31 Figures 2, 5	<u>Intrinsic Evidence:</u> Abstract; Figs. 2 – 6; 1:60- 64; 3:2-12; 3:28-33; 3:34- 45; 3:42-56; 4:4-8; 4:51- 54; 4:54-58; 4:59- 5:1; 5:27-31; 6:28-30; 7:45-47; and 7:11-13.
23		<u>Extrinsic evidence:</u> Expert testimony of Dr. Hayes	2002-06-27 Response to Non-Final Office Action at 9-10.
24			U.S. Pat. No. 5,650,971
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		<p>(“Longway <i>et al.</i>”) at Figures 4a and 6a.</p> <p><u>Extrinsic Evidence:</u> The American Heritage Dictionary of the English Language, 4th Ed., 2001 at 712 (“response”). Random House Webster’s Dictionary, 4th Ed., 2001 at 615 (“response”). Newton’s Telecom Dictionary, 16.5 Ed., 2000 at 320 (“enable”). Wiley Electrical Engineering and Electronics Dictionary 2004, at 256, 22-23 (“enable,” “amplifier”). McGraw-Hill Dictionary of Scientific and Technical Terms, 6th Ed. at 716, 1898, 89-90 (“enable,” “sense,” “amplifier”).</p>
<p>“electrically the same”</p> <p>(claims 1, 8)</p>	<p>No construction necessary; plain and ordinary meaning applies. In the alternative, and only to the extent the Court determines that a construction is necessary:</p> <p>“having the same voltage”</p> <p><u>Intrinsic evidence:</u> File History, Response to Non-Final Office Action, dated June 19, 2002, pp. 9-11</p> <p>Figures 2, 5</p>	<p>Indefinite OR, if amenable to construction, “same voltage”</p> <p><u>Intrinsic Evidence:</u> Abstract; Figs. 2 – 6; 1:60- 64; 3:2-12; 3:41-56; 4:4-9; 6:28-30; 7:11-13; 7:45-47</p> <p><u>Extrinsic evidence:</u> Wiley Electrical Engineering and Electronics Dictionary 2004, at 229.</p>

1		<u>Extrinsic evidence:</u> “electric potential” – “The potential difference between the point and some equipotential surface, usually the surface of the earth, which is arbitrarily chosen as having zero potential (remote earth).” IEEE Dictionary of Standard Terms (7 th Ed., 2000).	Modern Dictionary of Electronics, 7th Ed., at 234. The Illustrated Dictionary of Electronics, 8th Ed., at 231.
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8		Expert testimony of Dr. Hayes	

‘208 Patent:

12	Claim Term	Plaintiff’s Proposed Construction	Defendant’s Proposed Construction
14	“sense enable signal”	“a signal that enables the sense amplifier to function as intended”	Plain meaning
15	(claims 1, 4, 9, 22, 25)	<u>Intrinsic evidence:</u> Col. 2, ll. 33-35 Col. 3, ll. 5-8 Col. 6, ll. 9-13 Figures 2, 3, 4	<u>Intrinsic evidence:</u> Abstract; 1:34-37; Figs. 1-4.
16		<u>Extrinsic evidence:</u> Expert testimony of Dr. Hayes	<u>Extrinsic evidence:</u> McGraw-Hill Dictionary of Scientific and Technical Terms, 6th Ed. at 716, 1898.
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22	“at about the same time as the assertion of the sense enable signal”	“immediately before or immediately after the assertion of the sense enable signal, during a time span that is a fraction of the associated clock signal’s period”	indefinite
23	(claims 1, 22)	<u>Intrinsic evidence:</u> Col. 4, ll. 4-17 Col. 4, l. 62 through Col. 5, l. 3	<u>Intrinsic evidence:</u> Abstract; 4:9-12; 4:67-5:3; 2:55-57; 4:9-17.
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1		Figures 3, 4	
2		<u>Extrinsic evidence:</u>	
3		Expert testimony of Dr. Hayes	
4	“self-timed storage device” / “self	No construction necessary;	“a storage device whose
5	timed latch”	plain and ordinary meaning	timing is based only on
6	(claims 1, 22)	applies.	input data”
7		<u>Intrinsic evidence:</u>	<u>Intrinsic evidence:</u>
8		Col. 2, ll. 36-42	Figs 1-4; Abstract; 2:36-
9		Col. 3, ll. 28-32	42; 3:28-32; 5:26-36;
10		Col. 4, ll. 38-41	6:19-22; 6:41-43; 6:57-
11		Col. 5, ll. 26-36	58.
12		Col. 6, ll. 18-21	
13		Figures 2, 3	<u>Extrinsic evidence:</u>
14		<u>Extrinsic evidence:</u>	Microsoft Computer
15		Expert testimony of Dr. Hayes	Dictionary, 5 th Ed. at
16			471.
17	“storing data	No construction necessary;	“storing data
18	corresponding to the	plain and ordinary meaning	corresponding to the
19	amplified data	applies.	amplified data signal only
20	signal only in		dependent on the
21	response to the	<u>Intrinsic evidence:</u>	amplified data signal” /
22	amplified data	Col. 2, ll. 38-41	“latching the data only
23	signal” / “latching	Col. 3, ll. 28-32	dependent on the
24	the data in response	Col. 5, ll. 25-35	amplified data signal”
25	to only the	Figures 2, 3	
26	amplified data	<u>Extrinsic evidence:</u>	<u>Intrinsic Evidence:</u>
27	signal”	Expert testimony of Dr. Hayes	Figs 1-4; Abstract; 2:36-
28	(claims 1, 22)		42; 3:28-32; 5:26-36;
			6:19-22; 6:41-43; 6:57-
			58.
			<u>Extrinsic Evidence:</u>
			McGraw-Hill Dictionary
			of Scientific and
			Technical Terms, 6th Ed.
			at 89-90.

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